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TRA DOCKET ROOM

Guy M. Hicks
General Counsel

615 214-6301
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May 10, 2005

VIA HAND DELIVERY

Hon Pat Miller, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Petition of BSLD to Amend its Certificate of Public Convenience and Necessity to
Provide Facilities-Based Interexchange Services in the State of Tennessee*
Docket No. 05-00137

Dear Chairman Miller:

Enclosed is the response to the TRA Staff's data request issued on May 23, 2005.
We appreciate the Staff's consideration in allowing us additional time to respond to this
request.

Very truly yours,

A large, stylized handwritten signature in black ink, consisting of a long horizontal stroke with a large loop at the end and a smaller loop at the beginning.

Guy M. Hicks
on behalf of BellSouth Long Distance, Inc.

REQUEST: Has the petitioner filed similar petitions in other states? If so, please provide a listing of states and actions taken or pending.

RESPONSE: The petitioner has filed a similar petition in North Carolina. On July 25, 2002, BellSouth Long Distance, Inc. submitted an Application to the North Carolina Utilities Commission to Amend its Certificate of Public Convenience and Necessity to Operate as a Facilities Based Provider of Interexchange Telecommunications Services (Docket No. P-654, SUB 2). The North Carolina Utilities Commission issued an Order dated September 24, 2002, granting the Company's request to amend its certificate of public convenience and necessity to authorize the provision of facilities-based long distance telecommunications services. This action did not affect the Company's separate Certificate of Public Convenience and Necessity to provide facility-based local exchange service in North Carolina.

In the Petition filed with the Tennessee Regulatory Authority, BellSouth Long Distance, Inc. seeks the same result as it obtained in North Carolina. Specifically, BellSouth Long Distance Inc. seeks to expand its current authority to offer interexchange telecommunications services on a resale basis to include operation as a facility-based service provider. BellSouth Long Distance Inc. does not intend for this Petition to change or otherwise affect its Certificate of Public Convenience and Necessity to operate as a facility-based provider of local telecommunications service which was granted by the Authority in TRA Docket 03-00602.

REQUEST: Please provide notice of this filing to the incumbent local exchange carriers and facilities-based interexchange carriers in Tennessee, and provide the TRA a copy of the certificate of service.

RESPONSE: BellSouth Long Distance provided notice to the incumbent local exchange carriers and facilities-based interexchange carriers in Tennessee on June 9, 2005. Please see Attachment 1 for a copy of the Notice and certificate of service which includes the service list

Attachment 1

BellSouth Long Distance, Inc
400 Perimeter Center
Suite 400, North Terraces
Atlanta, GA 30346

harris.anthony@bellsouth.com

Harris R. Anthony
Vice President
and General Counsel

770 352 3116
Fax 770 352 3332

June 9, 2005

Mr. Gary Andraza
Assistant Vice President Government Affairs
AT&T Communications
414 Union Street
Suite 1830
Nashville, TN 37219

RE: BellSouth Long Distance, Inc (BSLD) Petition to Amend Its Certificate of Public Convenience and Necessity to Provide Facilities-Based Interexchange Services in Tennessee; Docket Number 05-00137

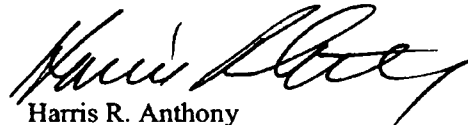
Dear Mr. Andraza:

On May 6, 2005, BellSouth Long Distance, Inc. filed a Petition to Amend its Certificate of Public Convenience and Necessity to Provide Facilities-Based Interexchange Services in the State of Tennessee. If you would like a copy of the Petition or need further information, please contact:

Mary Jean Dennis
Director-Business Implementation & Compliance
400 Perimeter Center Terrace, Suite 350
Atlanta, GA 30346
(770) 352-3077 (phone)
(770) 443-3470 (fax)
mary.dennis@bellsouth.com (email)

A copy of this notice is being provided to all Incumbent Local Exchange Carriers and Interexchange Carriers certificated in the State of Tennessee.

Very truly yours,



Harris R. Anthony

HRA/caj

TENNESSEE REGULATORY AUTHORITY

In Re: BellSouth Long Distance, Inc. (BSLD) Petition)
to Amend its Certificate of Public Convenience and) Docket No. 05-00137
Necessity to Provide Facilities-Based Interexchange)
Services in Tennessee)

NOTICE OF SERVICE


I hereby certify that I have served a copy of the notice regarding the Petition of BellSouth Long Distance, Inc. to Amend its CCN to Provide Facilities-Based Interexchange Services in the State of Tennessee by placing a copy of same in the United States Mail, postage prepaid to the following Incumbent Local Exchange Carriers and Interexchange Carriers certificated in the State of Tennessee, on this the 9th day of June, 2005.

Facilities-Based Long Distance Carriers (Inter-LATA)

AT&T Communications
MCI Telecommunications Corporation
Sprint Communications Company, L.P.
USCarrier Telecom, LLC

Incumbent Local Exchange Service Providers (Facilities Based)

Ardmore Telephone Company, Inc.
BellSouth Telecommunications, Inc.
Century Telephone of Adamsville
Century Telephone of Claiborne
Century Telephone of Ooltewah-Collegedale, Inc.
Citizens Communications Company of Tennessee
Citizens Communications Company of Volunteer State
Loreto Telephone Company, Inc.
Millington Telephone Company, Inc.
Sprint-United
TDS Telecom-Concord Telephone Exchange, Inc.
TDS Telecom-Humphreys County Telephone Company
TDS Telecom-Tellico Telephone Company, Inc.
TDS Telecom-Tennessee Telephone Company
TEC-Crockett Telephone Company, Inc.
TEC-People's Telephone Company, Inc.
TEC-West Tennessee Telephone Company, Inc.
United Telephone Company


Harris R. Anthony, VP & General Counsel
BellSouth Long Distance, Inc.
400 Perimeter Center Terrace, Suite 350
Atlanta, GA 30346
770-352-3116

REQUEST: Please identify all complaints filed with state and federal regulatory agencies involving BSLD. Identify the nature of the complaint and how the complaint was resolved.

RESPONSE: On November 12, 2003, BellSouth Long Distance, Inc. filed and Application with the TRA to provide competitive local telecommunications services (docket No. 03-00602). At that time, BSLD provided the TRA with a summary of complaints that had been filed with state and federal regulatory agencies covering a period from January 2003 through May 2003 and identified as Exhibit L in the Application. Attachment 2 includes a copy of Exhibit L and Attachment 3 contains a summary of complaints filed with state and federal regulatory agencies covering the time period from June 2003 through March 2005. While the number of long distance customers has grown substantially since introducing service in Tennessee beginning in December 2002, the number of customer complaints has remained very small.

Exhibit L**FCC/PSC COMPLAINTS-BSLD****January-May 2003****FCC Complaint Breakout**

Billing Format	1
Customer Suggestion	1
Marketing	1
Rates/Billing	1
Service Area	1
Slamming Allegations	1
Toll Call Dispute	2
Total	8

PSC Complaint Breakout

800 Service	1
Balance Dispute/Explain Bill	3
Calling Plan	5
Customer Suggestion/Info	5
Directions Unclear/Ease of Use	1
Employee Conduct/Attitude	1
Escalate Installation	1
Failure to Meet Customer Request	4
Inaccurate/Incomplete Instructions	6
Information Request	1
Service Order Problems	3
Slamming Allegations	16
Telemarketing Center	1
Toll block	1
Toll Call Dispute	10
Total	59

May-December 2002**FCC Complaint Breakout**

International Rates-Calling Card	1
Total	1

PSC Complaint Breakout

Information Request	2
BSLD not Available to CLEC Cust	1
Total	3

NOTE: All customer complaints have been resolved to the customer's satisfaction.

FCC/PSC Complaints-BSLD

All customer complaints have been resolved to the satisfaction of the specific State or Federal regulatory agency.

June - December 2003

FCC Complaint Breakout

Adjustment Due/Requested	1
Application of Rates-Tariffed Item	5
Balance Dispute/Explain Bill	4
Billing Dispute	2
Calling Plans	11
Customer Suggestion	2
Denial of Service in Error	1
Deposit Matters	1
Failure to meet Customer Request	8
Inaccurate/Incomplete Instructions/Info	8
Operator Services Rates	1
Service Order Problem	1
Services for Disabled/Special Needs	1
SLAM (Invalid)	2
Telemarketing Centers/DMDR	3
Toll Call Dispute	12
Translations Error	3
Total	66

PSC Complaint Breakout

Application of Rates/Rates (Tariffed Item)	3
Balance Dispute	2
Calling Plan	29
CPE Repair/CPE Vendor Problem	1
Customer Service	1
Customer Suggestion/Info	5
Failure to Meet Customer Request	10
Inaccurate/Incomplete Instructions	29
Overly Aggressive Sales Effort	1
Rebate/Promotional Coupon issue	3
Service Order Problem	4
SLAM-Valid	14
SLAM-Invalid	8
System Error Delay	1
Telemarketing Center	2
Toll Call Dispute	11
Translation Error (wrong number condition)	1
Total	125

FCC/PSC Complaints-BSLD

All customer complaints have been resolved to the satisfaction of the specific State or Federal regulatory agency.

January-December 2004

FCC Complaint Breakout

ASR Program/Vendor	2
Balance Dispute/Explain Bill	12
Bundled Services-Misquoted Rates/Bill Explanation	11
Calling Plans	15
Contract Termination Charges	1
Contract Terms & Conditions	3
Denial of Service	1
Deposit Matters	1
Failure to Meet Customer's Request	6
Harassing/Threatening/Misdirected Calls	1
Inaccurate/Incomplete Instructions Info	5
Local Call Dispute	2
Misc Charges	1
Misrepresentation as BS by Telemarketing Rep	1
Other	1
Overly Aggressive Sales Effort	1
PIC-C Universal Service Fund	1
Rebate/Promotional Coupon Issue	3
SLAM (Invalid)	3
SLAM (Valid)	3
Telemarketing Centers/DMDR	3
Toll Call Dispute	22
Translations Error	1
Unauthorized Connection/Disconnection of Svcs	1

Total **101**

PSC Complaint Breakout

Adjustment Due	3
Application of Rates/Rates (tariffed Item)	2
ASR Program/Vendor	4
Balance Dispute/Explain Bill	14
Bundled Services-Misquoted Rates/Bill Explanation	15
Busy Circuit Conditions/Slow Dial Tone	1
Calling Plans	119
Charge for Special Operator Service	1
Contract Terms & Conditions	3
Customer Suggestion/Info	11
Delay in Resolving/Timeliness	2
Failure to Meet Customer's Request	22
Inaccurate/Incomplete Instructions Info	30
Local Call Dispute	10
Misc Charges	4
Other	2
Overly Aggressive Sales Effort	2
PIC-C Universal Service Fund	5
Poor Quality Service-Line-(Static, Crosstalk, Etc)	1
Rebate/Promotional Coupon Issue	3
Service Order Issued	5
Service Order Problem	5
SLAM (Invalid)	24
SLAM (Valid)	36
System Error Delay	1
Toll Call Dispute	104
Unauthorized Connection/Disconnection of Svcs	7

Total **436**

FCC/PSC Complaints-BSLD

All customer complaints have been resolved to the satisfaction of the specific State or Federal regulatory agency.

January-March 2005

FCC Complaint Breakout

ASR Program/Vendor	1
Balance Dispute/Explain Bill	1
Bundled Services-Misquoted Rates/Bill Explanation	3
Calling Plans	8
Other	1
Rebate/Promotional Coupon Issue	2
Request for General Information	1
SLAM (Valid)	3
Toll Call Dispute	9

Total **29**

PSC Complaint Breakout

Balance Dispute/Explain Bill	1
Bundled Services-Misquoted Rates/Bill Explanation	2
Calling Plans	28
CLEC (only if not BellSouth issue)	1
Conditions/Terms Imposed by Rep	1
Contract Termination Charges	1
Contract Terms & Conditions	1
CPE Repair/CPE Vendor Problem	1
Delay in Resolving/Timeliness	1
Failure to Meet Customer's Request	6
Inaccurate/Incomplete Instructions Info	5
Local Call Dispute	8
Service Order Issued	3
Service Order Problem	1
SLAM (Invalid)	4
SLAM (Valid)	7
Toll Call Dispute	28
Unauthorized Connection/Disconnection of Svcs	1

Total **100**

REQUEST: Will there be changes to the rates, terms, and conditions currently on file with the TRA? If so, please provide an informational tariff for BSLD's proposed services.

RESPONSE: No.

REQUEST: Please provide the name and contact information for the person responsible for responding to regulatory complaints filed with the TRA.

RESPONSE: Mary Jean Dennis
Director-Business Implementation & Compliance
400 Perimeter Center Terrace, Suite 350
Atlanta, Georgia 30346
(770) 352-3077 (phone)
(678) 443-3470 (fax)
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